

FEDERAL COURT

B E T W E E N:

**JEREMIAH JOST, EDWARD CORNELL, VINCENT GIRCYS,
and HAROLD RISTAU**

Applicants

and

**GOVERNOR IN COUNCIL, HER MAJESTY IN RIGHT OF CANADA,
ATTORNEY GENERAL OF CANADA, and MINISTER OF PUBLIC SAFETY
AND EMERGENCY PREPAREDNESS**

Respondents

AFFIDAVIT OF STEVEN SHRAGGE

I, Steven Shragge, Senior Policy Advisor with the Privy Council Office, Security and Intelligence Secretariat, of the City of Ottawa in the Province of Ontario, AFFIRM THAT:

1. The answers set out in **Exhibit A** to this affidavit, in response to the written questions submitted by the Applicants on May 16, 2022, are true, to the best of my information, knowledge and belief.

2. Further, I attach copies of two unclassified Integrated Terrorism Assessment Centre (ITAC) Threat Highlight reports referred to in the written examination. Attached hereto and marked as **Exhibit B** is a copy of the Threat Highlight report numbered TH 22/08-A, dated 27 January 2022. Attached hereto and marked as **Exhibit C** is Threat Highlight report numbered TH 22/11-E, dated 8 February 2022.

3. I make this affidavit *bona fide*.

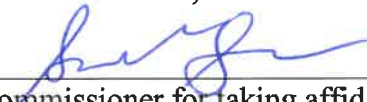
AFFIRMED BEFORE ME at the City of)
Ottawa, in the Province of Ontario)
This 15th day of June, 2022)
)
)
)
)
)


Commissioner for Taking Affidavit

LSO 63497W


STEVEN SHRAGGE

This is **Exhibit "A"** referred to
in the affidavit of
Steven Shragge
Affirmed before me this **15th** day
of **June, 2022.**



A Commissioner for taking affidavits

Uo 63497W

EXHIBIT A

ANSWERS TO WRITTEN EXAMINATION OF STEVEN SHRAGGE

1. I previously swore an affidavit on April 4, 2022 in this matter. This exhibit contains my answers to the written examination, which was served on counsel for the Respondent on May 16, 2022. Below is the chart setting out each question and the answer to that question or noting where an objection to the question has been made by counsel for the Respondent. Attached hereto as Annex 1 to Exhibit “A” is a chart prepared by counsel for the Respondent setting out those objections and refusals maintained by counsel for the Respondent and the basis for same.

No.	QUESTION	RESPONSE
1.	You did not give evidence or submissions to the Governor in Council when the hearing before the Governor General in Council was taking place on February 14, 2022 regarding whether to issue a Proclamation Declaring that a Public Order Emergency exists throughout Canada, P.C. 2022-0106?	Subject to counsel’s objection as outlined in Annex 1 my answer is: I did not give evidence or submissions to the Governor-in-Council (GIC) regarding whether to issue a Proclamation declaring the existence of a Public Order Emergency.
2.	You did not give evidence or submissions to the Governor in Council when the hearing before the Governor General in Council was taking place on February 14, 2022 regarding whether to issue the Order-in-Council: Order directing Special Temporary Measures for Public Order Emergency, P.C. 2022-0106?	I did not.
3.	You did not give evidence or submissions to the Governor in Council when the hearing before the Governor General in Council was taking place on February 15, 2022 regarding whether to issue the Order in Council: Emergency Measures Regulations, P.C. 2022-0107?	I did not.
4.	You did not give evidence or submissions to the Governor in Council when the hearing before the Governor General in Council was taking place on February 15, 2022 regarding whether to issue Order in Council: Emergency Measures Regulations, P.C. 2022-0108?	Order in Council: Emergency Measures Regulations, P.C. 2022-0108 is not the correct number. The correct number is Order in Council: Emergency Measures Regulations, P.C. 2022-0107 (as stated in Q3).

No.	QUESTION	RESPONSE
5.	You did not give evidence or submissions to the Governor in Council when the hearing before the Governor General in Council was taking place on February 15, 2022 regarding whether to issue the Order in Council: Emergency Economic Measures Order, P.C. 2022-0108?	I did not.
6.	You were not present before the Governor in Council when any of the hearings on February 14, 2022 and February 15, 2022 referred to in questions [1] through [5] herein took place?	I was not present before the Governor-in-Council during the decision making process of the GIC on February 14 or 15, 2022.
7.	You have no knowledge of any of the evidence in your affidavit, including any of its exhibits, being before the Governor in Council when any of the hearings on February 14, 2022 and February 15, 2022 referred to in questions [1] through [5] herein took place?	I have no knowledge as to whether any of the evidence in my affidavit, including any of its exhibits, was before the GIC when it made its decisions on February 14, 2022 and February 15, 2022.
8.	You are not the author of the document at Exhibit "A" of your affidavit?	Subject to counsel's objection in Annex 1, my answer is: I did not participate in the drafting of the explanation of the reasons for declaring a Public Order Emergency.
9.	The Governor-in-Council is not the author of the document at Exhibit "A" of your affidavit?	Subject to counsel's objection in Annex 1, my answer is: I did not note the listing of the Governor-in-Council as the author in the explanation. I am aware that the explanation was prepared by the Government of Canada and tabled in Parliament by the Minister of Public Safety and Emergency Preparedness.
10.	There is no author listed for the document at Exhibit "A" of your affidavit?	Subject to counsel's objection in Annex 1, my answer is: I did not note the listing of a specific author in the explanation.

No.	QUESTION	RESPONSE
		I am aware that the explanation was prepared by the Government of Canada and tabled in Parliament by the Minister of Public Safety and Emergency Preparedness.
11.	The Governor-in-Council is not the author of the document at Exhibit "B" of your affidavit?	Subject to counsel's objection in Annex 1, my answer is: I did not note the listing of the Governor-in-Council as the author in the Report. I am aware that the Report was prepared by the Government of Canada and tabled in Parliament by the Minister of Public Safety and Emergency Preparedness.
12.	Except for the letter authored by the Prime Minister annexed thereto, there is no author listed for the document at Exhibit "B" of your affidavit?	Subject to counsel's objection in Annex 1, my answer is: I have no direct knowledge of who specifically authored the document. I am aware that the Report was prepared by the Government of Canada and tabled in Parliament by the Minister of Public Safety and Emergency Preparedness.
13.	To your knowledge, did any of the Premiers of the Provinces in the consultation referred to in the letter of the Prime Minister annexed to Exhibit "B" support the invocation of the Emergencies Act , and if so, which ones?	Subject to counsel's objection in Annex 1, my answer is: Beyond what was stated in the report, I have no knowledge on the positions of the Premiers of the Provinces referred to in the letter of the Prime Minister annexed to Exhibit B.
14.	You will understand that when I refer to the Government of Canada hereafter, I am referring to the body responsible for the federal administration of Canada?	Yes, I accept the meaning of this definition when used.

No.	QUESTION	RESPONSE
15.	You will understand that when I refer to the Government of Canada it includes, but is not limited to, the executive branch being the Ministers of the Crown, Cabinet, and the federal civil service?	Yes, I accept this meaning of “Government of Canada” when used.
Integrated Terrorism Assessment Centre		
16.	As the Senior Policy Advisor with the Security and Intelligence Secretariat of the Privy Council, you have access to threat assessments completed by the Integrated Terrorism Assessment Centre (hereinafter referred to as “ITAC”)?	Yes, as I have access to the Integrated Terrorist Assessment Centre (ITAC) products in my role at PCO.
17.	ITAC is a federal government organization responsible for assessing terrorism threats to Canada and Canadian interests worldwide?	Yes, ITAC is one of the Government of Canada organizations responsible for assessing terrorism threats with a Canadian nexus. This includes ITAC assessing and recommending the National Terrorism Threat Level (NTTL) for Canada and Canadian interests abroad.
18.	ITAC is co-located with the Canadian Security Intelligence Service (CSIS) at its headquarters in Ottawa, Ontario?	Yes.
19.	ITAC operates under the provisions and authorities of the Canadian Security Intelligence Service Act, R.S.C., 1985, c. C-23?	It is my general understanding that ITAC operates under relevant provisions and authorities of the Canadian Security Intelligence Service Act.

No.	QUESTION	RESPONSE
20.	The products of ITAC support the decision-making needs of senior federal leaders?	ITAC products are an important source of information for senior federal leaders and are intended to provide an integrated and timely assessment of terrorist threats. In addition to ITAC reports, senior federal leaders are often provided advice, information, and unclassified and/or classified intelligence by a number of security agencies on terrorism or other national security issues to promote a comprehensive understanding of issues and considerations. Generally speaking this may take the form of written and/or oral briefs. For example, the following departments or agencies may also provide information to support the decision making needs of senior federal leaders as determined by the scope and context of each national security issue: • Royal Canadian Mounted Police (RCMP) – primary responsibility for the investigation, prevention and prosecution of criminal activities related to terrorism and national security; • Canadian Security Intelligence Service – Investigation and reporting of activities suspected of constituting threats to the security of Canada, per the CSIS Act. • Communications Security Establishment – Collects foreign signals intelligence on foreign threats to Canada’s national security; and • Canada Border Services Agency – Ensures border integrity and supports the RCMP and other agencies engaged in threat management and event response.

No.	QUESTION	RESPONSE
21.	ITAC employs professionals from departments and agencies within Canadian governments' security and intelligence community?	While I do not have an in-depth understanding or personal experience working at ITAC, to the best of my knowledge ITAC employs security professionals from various organizations within Canada's security and intelligence community.
22.	ITAC produces terrorism threat assessments that are based on classified and open-source information?	Yes, ITAC produces terrorism threat assessments that are derived from classified and/or non-classified information.
23.	The products of ITAC are shared with domestic law enforcement, including federal, provincial and municipal police?	Based on my working experience I believe that ITAC reports are made available to members of the security and intelligence community including law enforcement organizations at the federal, provincial, and municipal levels as a general practice. These products may be of various security classifications which can influence the degree to which reports may be disseminated. I have no direct knowledge on the distribution of specific ITAC reports to law enforcement agencies during the days leading up to invoking of the <i>Emergencies Act</i>.
24.	ITAC assessments provide senior-level decision makers with the latest and most detailed threat information, which helps them to assess the overall threat and risk level, and to make efforts to mitigate the possibility or impact, of terrorism?	Yes, ITAC products are an important source of information on terrorist threats that senior decision makers may consider when determining how best to manage risks within their respective authorities. However, as I've mentioned, ITAC does not have the exclusive authority over analyzing issues related to terrorist threats or violent extremism in Canada or providing information on these issues to decision makers. In particular, the Royal Canadian Mounted Police and Canadian Security Intelligence Service play lead roles in this space. Under their respective authorities each may collect information and

No.	QUESTION	RESPONSE
		investigate issues related to terrorist threats, threats to national security, and/or suspected criminal activities. Depending on the circumstances, other security departments or agencies may contribute additional information or context to decision makers on a security issue based on its implications.
25.	ITAC conducts National Terrorism Threat Level assessments?	Yes, ITAC conducts NTTL assessments as part of its mandate. However, other law enforcement and intelligence agencies (e.g. RCMP & CSIS) also conduct analysis on terrorism, conduct investigations, and provide information to decision makers consistent with their authorities and mandates.
26.	ITAC's National Terrorism Threat Level assessments assess the risk or likelihood of a violent act of terrorism?	Canada's NTTLs are determined by ITAC and represent the likelihood of a violent act of terrorism occurring in Canada. ITAC's assessments are rigorous and draws upon information and a wide array of intelligence from Canadian and international security partners. However, they recognize information may not always be complete. As such, it is important to keep in mind that an act of terrorism may occur without warning irrespective of the threat level.
27.	ITAC's National Terrorism Threat Level assessments are used by government and law enforcement agencies to mitigate the potential effects of terrorism incidents in Canada and abroad?	I have a general understanding that government departments and law enforcement agencies use ITAC's NTTL assessments as part of decision-making processes and to maintain situational awareness with respect to terrorist incidents. In my professional judgement and experience the NTTL's are an important source of information. However, as I've mentioned, other security departments, law enforcement, and security agencies also analyze and

No.	QUESTION	RESPONSE
		provide information on terrorist threats or violent extremism in Canada. Finally, it is important to recognize that threat information is not the only factor considered when determining the level of risk and how best to manage risks and mitigate the potential impacts of terrorism. The effectiveness or vulnerability of security measures to specific types of terrorist attacks is another key factor which is often considered in my experience. In such cases, decision makers can consider information and analysis that helps them to understand the degree to which measure are likely to detect or prevent a specific type of terrorist attack. Generally speaking this may draw upon different types of information from government departments (e.g. operational data), security agencies, and stakeholders.
28.	One of the purposes of ITAC's National Terrorism Threat Level assessments is to ensure a consistent understanding across the Government of the general terrorism threat to Canada?	Yes, that is correct.
29.	ITAC's National Terrorism Threat Level assessments have five (5) levels: Very Low, Low, Medium, High, and Critical?	Yes, that is correct.
30.	A ITAC National Terrorism Threat Level assessment of Very Low means a violent act of terrorism is possible but very unlikely, and measures are in place to keep Canadians safe?	My understanding is that ITAC's definition of Very Low for the national terrorism threat level means that ITAC assesses a violent act of terrorism is highly unlikely. While I note that a visual representation of the definition you offer is on public Government websites, I do not recall encountering this latter portion referencing "measures" in my experience.

No.	QUESTION	RESPONSE
		ITAC is best placed to provide precise details on the process and methods. As I understand it, the NTTLs are determined by ITAC based upon the assessed likelihood an individual or group may commit an act of terrorism. I believe this includes the consideration of intent, capabilities, and opportunities to carry out terrorist attacks as key factors.
31.	A ITAC National Terrorism Threat Level assessment of Low means a violent act of terrorism is possible but unlikely, and measures are in place to keep Canadians safe?	My understanding is that ITAC's definition of Low for Canada's national terrorism threat level means that ITAC assesses a violent act of terrorism is possible but unlikely. While I note that a visual representation of the definition you offer is on public Government websites, I do not recall encountering this latter portion referencing "measures" in my experience. ITAC is best placed to provide precise details on the process and methods. As I understand it, the NTTLs are determined by ITAC based upon the assessed likelihood an individual or group may commit an act of terrorism. I believe this includes the consideration of intent, capabilities, and opportunities to carry out terrorist attacks as key factors.

No.	QUESTION	RESPONSE
32.	A ITAC National Terrorism Threat Level assessment of Medium means a violent act of terrorism could occur, and additional measures are in place to keep Canadians safe?	My understanding is that ITAC's definition of Medium for Canada's national terrorism threat level means that ITAC assesses a violent act of terrorism could occur. While I note that a visual representation of the definition you offer is on public Government websites, I do not recall encountering this latter portion referencing "measures" in my experience. ITAC is best placed to provide precise details on the process and methods. As I understand it, the NTTLs are determined by ITAC based upon the assessed likelihood an individual or group may commit an act of terrorism. I believe this includes the consideration of intent, capabilities, and opportunities to carry out terrorist attacks as key factors.
33.	A ITAC National Terrorism Threat Level assessment of High means a violent act of terrorism is likely, heightened measures are in place to keep Canadians safe, and Canadians are informed what action to take?	My understanding is that ITAC's definition of High for Canada's national terrorism threat level means that ITAC assesses a violent act of terrorism is likely. While I note that a visual representation of the definition you offer is on public Government websites, I do not recall encountering this latter portion referencing "measures" in my experience. ITAC is best placed to provide precise details on the process and methods. As I understand it, the NTTLs are determined by ITAC based upon the assessed likelihood an individual or group may commit an act of terrorism. I believe this includes the consideration of intent, capabilities, and opportunities to carry out terrorist attacks as key factors.
34.	A ITAC National Terrorism Threat Level assessment of Critical means a violent act of terrorism is highly likely and could occur	My understanding is that ITAC's definition of Very High for Canada's national terrorism threat level means that

No.	QUESTION	RESPONSE
	imminently, exceptional measures are in place to keep Canadians safe, and Canadians are informed what action to take?	ITAC assesses a violent act of terrorism is highly likely and could occur imminently. While I note that a visual representation of the definition you offer is on public Government websites, I do not recall encountering this latter portion referencing “measures” in my experience. ITAC is best placed to provide precise details on the process and methods. As I understand it, the NTTLs are determined by ITAC based upon the assessed likelihood an individual or group may commit an act of terrorism. I believe this includes the consideration of intent, capabilities, and opportunities to carry out terrorist attacks as key factors.
35.	On January 27, 2022, the ITAC National Terrorism Threat Level assessment was Medium?	Yes, to the best of my knowledge the ITAC National Terrorism Threat Level was Medium on January 27, 2022.
36.	On February 8, 2022, the ITAC National Terrorism Threat Level assessment was Medium?	Yes, to the best of my knowledge the ITAC National Terrorism Threat Level was Medium on February 8, 2022.
37.	As of February 14, 2022, no ITAC National Terrorism Threat Level assessment carried out by ITAC after February 8, 2022 indicated National Terrorism Threat Level above Medium?	To the best of my knowledge the National Terrorism Threat level remained unchanged from Medium.
38.	As of February 15, 2022, no ITAC National Terrorism Threat Level assessment carried out by ITAC after February 8, 2022 indicated National Terrorism Threat Level above Medium?	To the best of my knowledge the National Terrorism Threat level remained unchanged from Medium
39.	Between January 27, 2022 and February 14, 2022, no ITAC National Terrorism Threat Level assessment carried out by ITAC indicated a National Terrorism Threat Level of High?	To the best of my knowledge the National Terrorism Threat level remained unchanged from Medium

No.	QUESTION	RESPONSE
40.	Between January 27, 2022 and February 15, 2022, no ITAC National Terrorism Threat Level assessment carried out by ITAC indicated a National Terrorism Threat Level of High?	To the best of my knowledge the National Terrorism Threat level remained unchanged from Medium
41.	Between January 27, 2022 and February 14, 2022, no ITAC National Terrorism Threat Level assessment carried out by ITAC indicated a National Terrorism Threat Level of Critical?	To the best of my knowledge the National Terrorism Threat level remained unchanged from Medium
42.	Between January 27, 2022 and February 15, 2022, no ITAC National Terrorism Threat Level assessment carried out by ITAC indicated a National Terrorism Threat Level of Critical?	To the best of my knowledge the National Terrorism Threat level remained unchanged from Medium
43.	From December 31, 2020 through to and including February 15, 2022, the ITAC National Terrorism Threat Level assessment has been Medium?	To the best of my knowledge the National Terrorism Threat level remained unchanged from Medium
44.	As the Senior Policy Advisor with the Security and Intelligence Secretariat of the Privy Council, you are familiar with the unclassified version of the Government of Canada's "Federal Terrorism Response Plan: Domestic Concept of Operation" that is attached hereto to this written interrogatory and marked as Exhibit "1" ?	Yes, I am generally familiar with the Federal Terrorism Response Plan but do not work with it on a day-to-day basis. In reviewing the document I noted that some references such as the Cabinet committee structure are out of date.
45.	And you can agree that at p. 8 of Exhibit "1" attached hereto, that the ITAC National Terrorism Threat Level assessment is explained?	The description on page 8 of the referenced document provides a very high-level overview of ITAC's National Threat Level assessment which is generally consistent with how I understand it. However, while I note that a visual representation of the definition you offer is on public websites, I do not recall encountering this latter portion referencing "measures" in my experience. ITAC is best placed to provide precise details on the process and methods it applies to its NTTL process.

No.	QUESTION	RESPONSE
46.	<i>Mark a Full Exhibit 1</i> The Respondents agree that the Government of Canada's "Federal Terrorism Response Plan: Domestic Concept of Operation" that is attached hereto and marked as Exhibit "1" can be a full exhibit in the herein proceedings without the necessity of it being exhibited to a further affidavit?	Subject to counsel's objection in Annex 1, my answer is: I do not work with the Federal Terrorism Response Plan on a regular basis. I note some of the references to Cabinet committees are out of date and as such cannot confirm with certainty that this is the most up-to-date version of the document.
47.	On January 27, 2022 ITAC released a document titled "Threat Highlight" and numbered as TH 22/08-A // 2022-01017 (hereinafter "Threat Highlight Jan 27")?	Yes, I am aware that ITAC released a Threat Highlight report numbered TH 22/08-A on 27 January 2022.
48.	You can access a true copy to the Threat Highlight Jan 27?	Yes I can.
49.	The Threat Highlight Jan 27 was provided by ITAC to police and government officials across Canada?	I am aware that the document in question was available to authorized individuals on a secure website used to share such reports. I have no direct or specific knowledge of which officials, organizations, or police agencies accessed or received this report.
50.	The Threat Highlight Jan 27 indicated that ITAC's National Terrorism Threat Level assessment was Medium?	Subject to counsel's objection in Annex 1, please see the January 27, 2022 ITAC report attached as Exhibit "B".
51.	The Threat Highlight Jan 27 indicated that protestors in a convoy of Canadian truck drivers and supports were expected to arrive in Ottawa, Ontario around January 28th and 29th of 2022?	Subject to counsel's objection in Annex 1, please see the January 27, 2022 ITAC report attached as Exhibit "B".
52.	The Threat Highlight Jan 27 indicated that Parliament returns from Christmas adjournment on January 31, 2022 and this return could motivate a dedicated group of protestors to prolong their protest in Ottawa and seek interaction with Canadian politicians?	Subject to counsel's objection in Annex 1, please see the January 27, 2022 ITAC report attached as Exhibit "B".
53.	The Threat Highlight Jan 27 indicated that a coordinated, complex terrorist attack or planned	Subject to counsel's objection in Annex 1, please see the January 27, 2022 ITAC report attached as Exhibit "B".

No.	QUESTION	RESPONSE
	storming of Parliament or other federal locations was unlikely?	
54.	On February 8, 2022 ITAC released a document titled “Threat Highlight” and numbered as TH 22/11-E // 2022-02-08) hereafter “ Threat Highlight Feb 8 ”)?	Yes, I am aware that ITAC released a Threat Highlight report numbered TH 22/11-E on 8 February 2022.
55.	You can access a true copy of the Threat Highlight Feb 8?	Yes. Please see Exhibit “C” attached hereto.
56.	The Threat Highlight Feb 8 indicated that ITAC’s National Terrorism Threat Level assessment was Medium?	Subject to counsel’s objection in Annex 1, please see the February 8, 2022 ITAC report attached as Exhibit “C” to this affidavit.
57.	The Threat Highlight Feb 8 indicated that ITAC assessed the likelihood of a coordinated, complex terrorist attack or a planned storming of Parliament, legislatures, or government offices as unlikely?	Subject to counsel’s objection in Annex 1, please see the February 8, 2022 ITAC report attached as Exhibit “C” to this affidavit.
58.	The Threat Highlight Feb 8 indicated that ITAC’s opinion was that protestors in Ottawa seeking to undertake legitimate protest were distinct from actors espousing violence?	Subject to counsel’s objection in Annex 1, please see the February 8, 2022 ITAC report attached as Exhibit “C” to this affidavit.
59.	The Threat Highlight Feb 8 indicated that the threat of real violence would come from the possibility of “potential lone actor attackers”, not the legitimate protestors?	Subject to counsel’s objection in Annex 1, please see the February 8, 2022 ITAC report attached as Exhibit “C” to this affidavit.
60.	As the Senior Policy Advisor with the Security and Intelligence Secretariat of the Privy Council, you can access true copies of all of the “Threat Highlight” documents released by ITAC?	Yes I can.
61.	At no time between January 27, 2022 and February 14, 2022 did ITAC issue a assessment, report of “Threat Highlight” document indicating the threat of activities directed toward undermining destruction or overthrow by violence of the constitutionally	I have no knowledge of whether or not ITAC issued an assessment report on this specific issue during this time period.

No.	QUESTION	RESPONSE
	established system of government in Canada, was high?	
62.	At no time between January 27, 2022 and February 14, 2022 did ITAC issue an assessment, report, or "Threat Highlight" document indicating the threat of activities directed toward undermining, destroying or overthrowing by violence of the constitutionally established system of government in Canada, was likely?	I have no knowledge of whether or not ITAC issued an assessment report on this specific issue during this time period.
63.	At no time between January 27, 2022 and February 14, 2022 did ITAC issue an assessment, report, or "Threat Highlight" document indicating the protests in Ottawa and at borders throughout Canada posed a high threat of espionage or sabotage that is against Canada or is detrimental to the interests of Canada or activities directed toward or in support of such espionage or sabotage?	I have no knowledge of whether or not ITAC issued an assessment report on this specific issue during this time period.
64.	At no time between January 27, 2022 and February 14, 2022 did ITAC issue an assessment, report, or "Threat Highlight" document indicating the protests in Ottawa and at borders throughout Canada posed a likely threat of espionage or sabotage that is against Canada or is detrimental to the interests of Canada or activities directed toward or in support of such espionage or sabotage?	I have no knowledge of whether or not ITAC issued an assessment report on this specific issue during this time period.
65.	At no time between January 27, 2022 and February 14, 2022 did ITAC issue an assessment, report, or "Threat Highlight" document indicating the protests in Ottawa and at borders throughout Canada were foreign influenced activities within or relating to Canada that are detrimental to the interests of Canada and are clandestine or deceptive or involve a threat to any person?	I have no knowledge of whether or not ITAC issued an assessment report on this specific issue during this time period.
66.	At no time between January 27, 2022 and February 14, 2022 did ITAC issue an assessment, report, or "Threat Highlight" document indicating the protests in Ottawa and	I have no knowledge of whether or not ITAC issued an assessment report on this specific issue during this time period.

No.	QUESTION	RESPONSE
	at borders throughout Canada were activities within or relating to Canada directed toward or in support of the threat or use of acts of serious violence against persons or property for the purpose of achieving a political, religious or ideological objective within Canada or a foreign state?	
67.	At no time between January 27, 2022 and February 14, 2022 did ITAC issue an assessment, report, or “Threat Highlight” document indicating the protests in Ottawa and at borders throughout Canada posed a high threat of activities within or relating to Canada directed toward or in support of the threat or use of acts of serious violence against persons or property for the purpose of achieving a political, religious or ideological objective within Canada or a foreign state?	I have no knowledge of whether or not ITAC issued an assessment report on this specific issue during this time period.
68.	At no time between January 27, 2022 and February 14, 2022 did ITAC issue an assessment, report, or “Threat Highlight” document indicating the protests in Ottawa and at borders throughout Canada posed a likely threat of activities within or relating to Canada directed toward or in support of the threat or use of acts of serious violence against persons or property for the purpose of achieving a political, religious or ideological objective within Canada or a foreign state?	I have no knowledge of whether or not ITAC issued an assessment report on this specific issue during this time period.
69.	At no time between January 27, 2022 and February 14, 2022 did ITAC issue an assessment, report, or “Threat Highlight” document indicating the protests in Ottawa and at borders throughout Canada seriously endangered the lives, health or safety of Canadians?	I have no knowledge of whether or not ITAC issued an assessment report on this specific issue during this time period.
70.	At no time between January 27, 2022 and February 14, 2022 did ITAC issue an assessment, report, or “Threat Highlight” document indicating the protests in Ottawa and at borders throughout Canada posed a high	I have no knowledge of whether or not ITAC issued an assessment report on this specific issue during this time period.

No.	QUESTION	RESPONSE
	threat of seriously endangering the lives, health or safety of Canadians?	
71.	At no time between January 27, 2022 and February 14, 2022 did ITAC issue an assessment, report, or “Threat Highlight” document indicating the protests in Ottawa and at borders throughout Canada posed a likely threat of seriously endangering the lives, health or safety of Canadians?	I have no knowledge of whether or not ITAC issued an assessment report on this specific issue during this time period.
72.	At no time between January 27, 2022 and February 14, 2022 did ITAC issue an assessment, report, or “Threat Highlight” document indicating the protests in Ottawa and at borders throughout Canada seriously threatened the ability of the Government of Canada to preserve the sovereignty, security and territorial integrity of Canada?	I have no knowledge of whether or not ITAC issued an assessment report on this specific issue during this time period.
73.	At no time between January 27, 2022 and February 14, 2022 did ITAC issue an assessment, report, or “Threat Highlight” document indicating the protests in Ottawa and at borders throughout Canada posed a high threat to the ability of the Government of Canada to preserve the sovereignty, security and territorial integrity of Canada?	I have no knowledge of whether or not ITAC issued an assessment report on this specific issue during this time period.
74.	At no time between January 27, 2022 and February 14, 2022 did ITAC issue an assessment, report, or “Threat Highlight” document indicating the protests in Ottawa and at borders throughout Canada posed a likely threat to the ability of the Government of Canada to preserve the sovereignty, security and territorial integrity of Canada?	I have no knowledge of whether or not ITAC issued an assessment report on this specific issue during this time period.
75.	<i>Undertaking 1 of 9</i> Can you undertake to provide true copies of all “Threat Highlight” documents released or dated by ITAC between January 26, 2022 and February 15, 2022?	Subject to counsel’s objection set out in Annex 1, my answer is: I have access to copies of ITAC Threat Highlight documents from this time period which are not to be disclosed publicly and include classified information.

No.	QUESTION	RESPONSE
76.	<i>Undertaking 2 of 9</i> Further, and in particular, can you undertake to provide true copies of both Threat Highlight Jan 27 and Threat Highlight Feb 8?	Subject to counsel's objection in Annex 1, I have provided true copies of Threat Highlight reports for January 27, 2022 (attached to my affidavit as Exhibit "B") and February 8, 2022 (attached to my affidavit Exhibit "C").
77.	<i>Undertaking 3 of 9</i> Can you undertake to provide true copies of all official results and records regarding ITAC's National Terrorism Threat Level assessments completed, dated or released between January 27, 2022 and February 15, 2022?	Subject to counsel's objection set out in Annex 1, my answer is: I have access to copies of ITAC Threat Highlight documents from this time period which are not to be disclosed publicly and include classified information.
78.	Can you agree the excerpts of documents attached hereto and marked as Exhibit "2" are excerpts from Threat Highlight Jan 27 and Threat Highlight Feb 8?	Subject to the objection from counsel set out in Annex 1, these excerpts appear accurate to the best of my knowledge, however, I would encourage you to refer to the true copies of these documents, attached to my affidavit as Exhibits "B" and "C".
79.	<i>Mark a Full Exhibit 2 of 3</i> The Respondents agree that the excerpts from Threat Highlight Jan 27 and Threat Highlight Feb 8 that are attached hereto and marked as Exhibit "2" can be a full exhibit in the herein proceedings without the necessity of it being exhibited to a further affidavit?	No. See Counsel's objection in Annex 1.
80.	ITAC shares information and intelligence with the Security and Intelligence Secretariat at the Privy Council Office?	Yes.
81.	ITAC did not request or recommend that the Government of Canada invoke the <i>Emergencies Act</i> on or before February 14, 2022?	I have no knowledge of whether ITAC did or did not recommend the invocation of the <i>Emergencies Act</i>.
82.	You have no knowledge of ITAC requesting or recommending to the Government of Canada that they invoke the <i>Emergencies Act</i> on or before February 14, 2022?	I have no knowledge of whether ITAC did or did not recommend the invocation of the <i>Emergencies Act</i>.
Communications Security Establishment		

No.	QUESTION	RESPONSE
83.	As the Senior Policy Advisor with the Security and Intelligence Secretariat of the Privy Council, you are familiar with the Government of Canada's Communications Security Establishment ("CSE")?	Yes, I am generally familiar with the Communications Security Establishment (CSE).
84.	The CSE was founded in 1946?	I cannot say definitely that the CSE was founded in 1946.
85.	The CSE is the Government of Canada's national cryptologic agency, providing the Government of Canada with information technology security and foreign signals intelligence?	Yes, I am generally familiar with the Communications Security Establishment (CSE).
86.	The CSE has a team of professionals that work quietly detecting, assessing, and responding to national security challenges?	In my experience the Communications Security Establishment works diligently and professionally to deliver on its mandate by gathering foreign signals intelligence to defend Canada's national security, keeping the Government of Canada's information secure, and working to protect Canadians from cyber threats.
87.	The Chief of CSE effective June 27, 2018 to present is Shelly Bruce?	I am aware that Shelly Bruce is currently the Chief of CSE.
88.	In 2007 to 2009 Shelly Bruce was seconded to the Security and Intelligence Secretariat at the Privy Council Office as Director, Operations?	I was not aware of that.
89.	The CSE shares information and intelligence with the Security and Intelligence Secretariat at the Privy Council Office?	Yes, the CSE shares information with the Security and Intelligence Secretariat at the Privy Council Office.
90.	Shelly Bruce did not request or recommend to the Government of Canada to invoke the Emergencies Act on or before February 14, 2022?	I have no knowledge of whether Shelly Bruce did or did not request or recommend the invocation of the <i>Emergencies Act</i> .
91.	You have no knowledge of Shelly Bruce requesting or recommending to the Government of Canada that they invoke the Emergencies Act on or before February 14, 2022?	I have no knowledge of whether Shelly Bruce did or did not request or recommend the invocation of the <i>Emergencies Act</i> .
92.	The CSE did not request or recommend the Government of Canada invoke the	I have no knowledge of whether CSE did or did not request or recommend the

No.	QUESTION	RESPONSE
	Emergencies Act on or before February 14, 2022?	Government of Canada to invoke the <i>Emergencies Act</i> on or before February 14, 2022.
93.	You have no knowledge of CSE requesting or recommending to the Government of Canada that they invoke the Emergencies Act on or before February 14, 2022?	I have no knowledge of whether CSE did or did not request or recommend the Government of Canada to invoke the <i>Emergencies Act</i> on or before February 14, 2022.
Royal Canadian Mounted Police		
94.	You are familiar with the Royal Canadian Mounted Police (“RCMP”)?	Yes.
95.	Since April 17, 2018 to present the head of the RCMP has been Commissioner Brenda Lucki?	I am aware that Brenda Lucki is currently the RCMP commissioner.
96.	Commissioner Brenda Lucki did not request or recommend to the Government of Canada that it invoke the <i>Emergencies Act</i> on or before February 14, 2022?	I am aware that Commissioner Lucki stated publicly she did not request the Government of Canada invoke the <i>Emergencies Act</i> .
97.	You have no knowledge of Commissioner Brenda Lucki requesting or recommending to the Government of Canada that they invoke the Emergencies Act on or before February 14, 2022?	I am aware that Commissioner Lucki stated publicly she did not request the Government of Canada invoke the <i>Emergencies Act</i> . I am not aware of whether or not Commissioner Lucki recommended that the Government of Canada invoke the <i>Emergencies Act</i> .
98.	The RCMP did not request or recommend the Government of Canada invoke the Emergencies Act on or before February 14, 2022?	I am not aware of whether or not the RCMP recommended that the Government of Canada invoke the <i>Emergencies Act</i> . However, I have noted that Commissioner Lucki has stated publicly she did not make such a request.
99.	You have no knowledge of the RCMP requesting or recommending to the Government of Canada that they invoke the <i>Emergencies Act</i> on or before February 14, 2022?	I am not aware of whether or not the RCMP recommended that the Government of Canada invoke the <i>Emergencies Act</i> .

No.	QUESTION	RESPONSE
		However, I have noted that Commissioner Lucki has stated publicly she did not make such a request.
Canadian Security Intelligence Service		
100.	You're familiar with the Canadian Security Intelligence Service ("CSIS")?	Yes.
101.	CSIS administers the <i>Canadian Intelligence Security Intelligence Service Act</i> , RSC 1985, c. C-23?	The CSIS Act provides the legislative foundation for CSIS. Based on my understanding, it outlines things such as CSIS' mandate, authorities, role and responsibilities, and accountability processes.
102.	Since June 19, 2017 David Vigneault has been the Director of CSIS?	I am aware that David Vigneault is currently the Director of CSIS but am not familiar with when he began in that role.
103.	Directly prior to David Vigneault's appoint as Director of CSIS, he was assistant secretary to Cabinet advising on security and intelligence?	I am aware that Mr. Vigneault worked as the Assistant Secretary to Cabinet for Security and Intelligence at PCO, however, I'm not familiar with any additional details.
104.	David Vigneault did not request or recommend to the Government of Canada invoking the Emergencies Act on or before February 14, 2022?	I am not aware of whether or not Mr. Vigneault requested or recommended that the Government of Canada invoke the <i>Emergencies Act</i> .
105.	You have no knowledge of David Vigneault requesting or recommending to the Government of Canada that they invoke the <i>Emergencies Act</i> on or before February 14, 2022?	I am not aware of whether or not Mr. Vigneault requested or recommended that the Government of Canada invoke the <i>Emergencies Act</i> .
106.	CSIS did not request or recommend the Government of Canada invoke the <i>Emergencies Act</i> on or before February 14, 2022?	I am not aware of whether or not CSIS requested or recommended that the Government of Canada invoke the <i>Emergencies Act</i> .
107.	You have no knowledge of CSIS requesting or recommending to the Government of Canada invoke the <i>Emergencies Act</i> on or before February 14, 2022?	I am not aware of whether or not CSIS requested or recommended that the Government of Canada invoke the <i>Emergencies Act</i> .

No.	QUESTION	RESPONSE
108.	You know that CSIS issues a public annual report each year?	Yes.
Ideologically Motivated Violent Extremism		
109.	Exhibit “A” of your affidavit refers to “Ideologically motivated violent extremism” (“IMVE”) at pages 11 and 12?	Yes it does.
110.	Can you agree that the first public annual report for CSIS that uses the phrase or term “Ideologically motivated violent extremism” and “IMVE” is the CSIS Public Report 2019?	Yes, I am aware that the 2019 annual report includes IMVE terminology. While I know such terminology is a relatively recent change to the Government lexicon on violent extremism I am not certain that 2019 is the first time it was used.
111.	You can agree that by clicking on this link: https://publications.gc.ca/collections/collection_2020/scrs-csis/PS71-2019-eng.pdf a full true copy of the CSIS Public Report 2019 is available for your viewing?	Please see the objection from counsel in Annex 1.
112.	IMVE is explained at p.13 of the CSIS Public Report 2019?	Yes.
113.	At p.13 of the CSIS Public Report 2019 it gives a definition of IMVE, an example of IMVE, and four categories of IMVE?	Yes it does.
114.	You can agree p.13 of the CSIS Public Report 2019 states the following: Ideologically motivated violent extremism (IMVE) is often driven by a range of grievances and ideas from across the traditional ideological spectrum. The resulting worldview consists of a personalized narrative which centres on an extremist’s willingness to incite, enable and or mobilize to violence. Extremists draw inspiration from a variety of sources including books, images, lectures, music, online discussions, videos and conversations. Given the diverse combination of motivations and personalized worldviews of recent mass-	Yes.

No.	QUESTION	RESPONSE
	casualty attackers, the use of such terms as “right-wing” and “left-wing” is not only subjective, but inaccurate in describing the complexity of motivations of IMVE attacks in Canada and abroad. EXAMPLE OF IMVE On January 13, 2020, an individual pleaded guilty to two counts of attempted murder and one count of breach of probation. The individual stabbed a woman multiple times and injured her baby on June 3, 2019. He self-identified as an Incel (involuntarily celibate) and took some inspiration from the 2018 Toronto van attack in which 10 people were killed and 16 wounded. Xenophobic Violence Xenophobic violence is defined as the fear or hatred of what is perceived to be foreign, different or strange, which leads to racially motivated violence. This has traditionally been referred to in the Canadian context as white supremacy or neo-Nazism. Anti-authority Violence Anti-authority violence is defined as the opposition to, or rejection of, the authority of the State which leads to anti-Government and violence against law enforcement. The 2014 Moncton shooting is an example of antiauthority violence. Gender-driven Violence Gender-driven violence is defined as the hatred of those of a different gender and or sexual orientation which can lead to violent misogyny. The 2018 Toronto van attack is an example of gender-driven violence. Other Grievance-driven and Ideologically Motivated Violence Some ideologically motivated violent extremists act without a clear affiliation to an organized group or external guidance. They are nevertheless shaped by the echo chambers of	

No.	QUESTION	RESPONSE
	online hate that normalize and advocate violence. More than ever, the internet allows individuals to not only share their extreme views, but also their manifestos and details of attacks. All these activities can inspire others to conduct attacks of their own.	
115.	You agree that the definition of IMVE, the example of IMVE, and the four categories of IMVE as stated immediately above and at p.13 of the CSIS Public Report 2019 are true and accurate?	This definition and examples provided are consistent with my understanding of IMVE based on my experience working with Government security partners during my time at the PCO Security and Intelligence Secretariat.
116.	You are aware that there are certain and specific “IMVE Groups” that are designated “terrorist entities” under the Criminal Code of Canada?	Yes. I am aware that the Government of Canada has listed a number of terrorist entities (i.e. a group or person) under the Criminal Code that includes IMVE groups.
117.	There are a total of eight (8) IMVE Groups designated “terrorist entities” under the Criminal Code of Canada, and they include and are limited to the following: a. Combat 18, b. Blood and Honour, c. Proud Boys, d. Atomwaffen Division, e. The Base, f. The Russian Imperial Movement, g. Three Percenters; and h. Aryan Strikeforce?	Please see the objection from counsel in Annex 1.
118.	You can agree that to be designated a terrorist entity under the Criminal Code of Canada requires some form of evidence that demonstrates an entity has knowingly carried out, attempted to carry out, participated in or facilitated a terrorist activity, or has knowingly acted on behalf of, at the direction of, or in association with such an entity?	Please see the objection from counsel in Annex 1.
119.	You agree that the recommendation to list an entity in the <i>Criminal Code</i> terrorist listings regime is based on a security or criminal intelligence report prepared by either CSIS or	Please see the objection from counsel in Annex 1.

No.	QUESTION	RESPONSE
	Public Safety Canada, or a criminal intelligence report prepared by the RCMP?	
120.	You agree the last addition of an entity to the terrorist entity listings regime under the Criminal Code of Canada was in 2021?	Subject to counsel's objection in Annex 1, my answer is: To the best of my knowledge terrorist entities were last added under the Criminal Code in 2021.
121.	You agree there is no specific mention in your affidavit or any of its exhibits of Combat 18, Blood and Honour, Proud Boys, Atomwaffen Division, The Base, The Russian Imperial Movement, Three Percenters, or Aryan Strikeforce?	Please see the objection from counsel in Annex 1.
122.	You agree that in your affidavit at Exhibit "A" on page 5 it discusses a group called "Canada Unity"?	Yes.
123.	You agree the purported founder of Canada Unity is James Bauder?	I do not have an in-depth knowledge of the Canada Unity group, its origins, or Mr. Bauder. I cannot recall with certainty that Mr. Bauder was the supposed founder of the group.
124.	You agree that to the best of your knowledge that you have no information of James Bauder committing a physical act of violence against another individual on and between January 27, 2022 and February 14, 2022?	I do not recall any such event.
125.	You agree that to the best of your knowledge that you have no information of James Bauder advocating for other individuals to commit a physical act of violence against another individual on and between January 27, 2022 and February 14, 2022, other than advocating that Prime Minister Justin Trudeau be arrested?	I have no knowledge of any such event during that time period.
126.	You agree there is no specific mention in your affidavit or any of its exhibits of any individual being physically injured on or between January 27, 2022 and February 14, 2022 in Ottawa?	Please see the objection from counsel in Annex 1.

No.	QUESTION	RESPONSE
127.	You agree there is no specific mention in your affidavit or any of its exhibits of any individual being physically injured between January 27, 2022 and February 14, 2022 at protests and purported “blockades” outside of Ottawa?	Please see the objection from counsel in Annex 1.
Parliamentary Security		
128.	On October 22, 2014 a lone attacker, Michael Zehaf-Bibeau, carried out an attack on Parliament Hill with a firearm?	Subject to counsel’s objection in Annex 1, my answer is: I recall Zehaf-Bibeau carrying out an attack at the National War Memorial and Parliament Hill in October 2014.
129.	In the October 22, 2014 attack, Michael Zehaf-Bibeau shot and killed Corporal Nathan Corillo of the Canadian Armed Forces?	Subject to counsel’s objection in Annex 1, my answer is: I recall Zehaf-Bibeau carrying out an attack at the National War Memorial and Parliament Hill in October 2014.
130.	Shortly after shooting Corporal Nathan Corillo, Michael Zehaf-Bibeau entered the Centre Block parliament building where Members of Parliament were, and engaged in a shootout with parliamentary security personnel?	Subject to counsel’s objection in Annex 1, my answer is: I recall Zehaf-Bibeau carrying out an attack at the National War Memorial and Parliament Hill on October 2014 where he was subsequently shot by parliamentary security.
131.	Following the October 22, 2014 attack on Parliament, security at Parliament was enhanced?	Subject to counsel’s objection in Annex 1, my answer is: I have no knowledge of Parliamentary security enhancements following this attack. I was not working at PCO S&I at the time.
132.	The enhancements in security at Parliament were focused on potential lone actor attackers, like Michael Zehaf-Bibeau?	Subject to counsel’s objection in Annex 1, my answer is: I have no knowledge of Parliamentary security enhancements following this attack. I was not working at PCO S&I at the time.
133.	Michael Zehaf-Bibeau’s attack on Parliament on October 22, 2014 had no link to any form of	Subject to counsel’s objection in Annex 1, my answer is:

No.	QUESTION	RESPONSE
	protest taking place outside or in the vicinity of Parliament?	I have no additional knowledge as I was not working at PCO S&I at the time.
134.	Can you agree many of the enhancements in security at Parliament arising from the October 22, 2014 attack were outlined in the June 3, 2015 document of the Hours of Commons titled “October 22, 2014 House of Commons Incident Response Summary” attached hereto and marked as Exhibit “3”? <i>Mark a Full Exhibit 3 of 3</i>	Subject to counsel’s objection in Annex 1, my answer is: I am unable to say whether or not this was the case as I was not working at PCO S&I the time and have no knowledge on the issue.
135.	The Respondents agree that the October 22, 2014 House of Commons Incident Response Summary attached hereto and marked as Exhibit “3” can be a full exhibit in the herein proceedings without the necessity of it being exhibited to a further affidavit?	Please see the objection from counsel in Annex 1.
136.	It is true that potential lone actor attackers do not require a protest to carry out an attack?	Based on my knowledge of violent extremism, a lone actor may mobilize to violence and carry out an attack based on their particular grievances and motivations with no forewarning. As we’ve seen in Canada and abroad, a protest is not a necessary prerequisite for an attack. However, I understand that protests can provide charged emotional environments that could be exploited by IMVE adherents or possibly serve as triggering events for those with intent for violence. I am aware that government officials have stated similar concerns publicly. For example, I am aware the Director of CSIS has stated publicly that they were concerned about lone actors who could engage in violence spontaneously in the context of the convoy.
Protests in Ottawa		
137.	During the protests in Ottawa between January 27, 2022 and February 6, 2022 there was an	Yes, I recall there being a visible increase in police presence in downtown Ottawa in and around Parliament.

No.	QUESTION	RESPONSE
	increase in security personal and police presence in and around Parliament?	
138.	During the protests in Ottawa between January 27, 2022 and February 16, 2022 the protestors were most saturated on Wellington Street in front of Parliament?	Generally speaking, I recall that there was a significant concentration of protestors and vehicles on City of Ottawa streets surrounding Parliament, Wellington Street, and many streets in proximity to the area. Other locations in the city were also occupied by protestors and vehicles for sustained periods of time including a location on Coventry Road.
139.	Close to the beginning of the protests between January 27, 2022 and February 16, 2022, the police and/or other government personal placed concrete barriers that block access of motor vehicles to Wellington Street in front of Parliament?	I recall seeing concrete barriers installed at certain locations on streets leading to Wellington street. However, I cannot say with certainty when or precisely where this took place.
140.	Concrete barriers are still placed on Wellington Street to the date of you being provided the herein Written Examination, and Wellington Street is closed to vehicles for two and a half blocks in front of Parliament?	Yes, I have observed that concrete barriers remain in place.
Incident Response Group		
141.	In your affidavit sworn April 4, 2022 and filed in these proceedings you discuss the “Incident Response Group”?	Yes, the Incident Response Group is referenced in my affidavit.
142.	What are the names and titles of all the members of the Incident Response Group referred to in your affidavit.	Subject to counsel’s objection in Annex 1, my answer is: My understanding is there is no fixed membership for the Incident Response Group (IRG). As outlined on the Prime Minister’s website, the IRG is a working group of ministers and membership may consist of relevant ministers, senior government leadership, and vary based on the nature of an incident.

No.	QUESTION	RESPONSE
143.	At paragraph 5 of your affidavit you state the Incident Respondent Group had three meetings, one on each of February 10, 12 and 13, 2022?	Yes.
144.	Were you a member, participant or attendee at any of the Incident Respondent Group meetings on February 10, 12 and 13, 2022?	No I was not.
145.	<i>Undertaking 4 of 9</i> Can you undertake to produce a true copy of the mandate of the Incident Response Group referred to in your affidavit?	Subject to counsel's objection in Annex 1, my answer is: The description of the mandate found on the Prime Ministers website is an accurate representation of the IRG's mandate. With respect to the IRG, it states it "serves as a dedicated emergency committee in the event of a national crisis or during incidents elsewhere that have major implications for Canada. It is responsible for coordinating a prompt federal response to an incident, and making fast, effective decision to keep Canadians safe and secure, at home and abroad. This content on the PM's website is the only official document outlining the Group's mandate that I am aware of.
146.	<i>Undertaking 5 of 9</i> Can you undertake to produce true copies of all minutes, notes, and records before and created by the members and attendees of the Incident Response Group meetings on February 10, 12 and 13, 2022 referred to in your affidavit?	Please see the objection from counsel in Annex 1.
Protests at Ambassador Bridge, Windsor, Ontario		
147.	On Friday February 11, 2022 an injunction was granted by the Superior Court of Ontario to end the protest and remove protestors and vehicles from the Ambassador Bridge border crossing in Windsor, Ontario?	Yes, I am aware that an Ontario Superior Court granted an injunction on February 11, 2022. To the best of my knowledge this included provisions related to the removal of people or vehicles that impeded or blocked access to the Ambassador Bridge and approaching roadways.

No.	QUESTION	RESPONSE
148.	By Sunday February 13, 2022 the police had ended the protest and removed protestors and vehicles from the Ambassador Bridge border crossing in Windsor, Ontario?	I believe that Windsor police undertook enforcement actions throughout the day of Sunday 13, 2022. This included the removal of vehicles and the arrest of some protestors. To the best of my knowledge the Ambassador Bridge port of entry was re-opened that evening. At the same time, I recall the situation remaining quite dynamic. As such, I recall Police were also taking steps to protect the Ambassador bridge against potential future disruptions.
Protests at Coutts, Alberta		
149.	On February 13, 2022 the RCMP obtained warrant(s) under the Criminal Code of Canada to search vehicles and trailers of several persons at the Coutts, Alberta border?	I am not aware of the specific date that the RCMP obtained warrants they used to search vehicles and trailers on February 14, 2022.
150.	In the early morning on February 14, 2022 the RCMP executed the warrant and arrested 13 individuals on charges ranging from weapons offences to mischief, with three charged with conspiracy to commit murder?	I recall media reporting and statements from the RCMP that 13 individuals in total were arrested near the Coutts Port of Entry on February 14, 2022. This included the seizure of weapons and ammunition when executing the search warrants. To my knowledge, these individuals were charged with a number of offences including multiple conspiracy to commit murder charges which were the most memorable.
151.	The RCMP advised the public that the 13 individuals arrested were from a small group holding a militant mindset?	I recall media reporting and statements by the RCMP which suggested those arrested harbored militant and anti-government sentiments. I also recall media reports of extremist imagery being found on some of items seized from the accused.
152.	The RCMP advised the public they knew about the activities and conduct of the 13 individuals arrested from the small group at the outset of	I am not aware that the RCMP advised the public that they knew about these 13 individuals in advance of the protest.

No.	QUESTION	RESPONSE
	the protest commencing at the Coutts, Alberta border crossing?	
153.	The RCMP did not use any powers to carry out the above investigation, warrant and arrest of the 13 individuals beyond those in the Criminal Code and the common law?	I have no knowledge of what powers the RCMP employed in carrying out their investigation on these individuals.
154.	The protestors at Coutts, Alberta were advised by the RCMP of the arrest of the above 13 individuals?	I do not recall that the RCMP advised protestors at Coutts, Alberta of the arrests by the RCMP. However, I do recall media interviews of protestors at the time indicating an awareness of the arrests after they occurred.
155.	On February 15, 2022 the protestors at the Coutts, Alberta border left peacefully?	I do not recall the precise circumstances regarding the restoration of access to the Coutts Port of Entry and protestors leaving the area. I do not remember there being any additional arrests.
Protests Outside Ottawa Generally		
156.	Can you agree that to your knowledge, all protests and purported border “blockades” that were outside Ottawa were cleared without using the powers under the Emergencies Act ?	I do not know for a fact that all protests outside of Ottawa were cleared by police of jurisdiction without using powers under the <i>Emergencies Act</i>. I do recall senior law enforcement officials such as RCMP Commissioner Lucki stating publicly that the powers provided useful tools to help law enforcement better address the unlawful assemblies. To the best of my knowledge, they referred in particular to the usefulness of powers that served to deter and prevent individuals from joining and supporting the unlawful assemblies.
157.	Can you agree that Commissioner Brenda Lucki of the RCMP has confirmed that the RCMP were successful in using a measured approach, utilizing existing legislation not	I am aware that Commissioner Lucki has stated the RCMP used a measured

No.	QUESTION	RESPONSE
	including the <i>Emergencies Act</i> , to resolve protests and purported “blockades”?	approach in resolving border blockades in areas of their jurisdiction. However, I also recall that the Commissioner and Interim Ottawa Police Chief each spoke to the usefulness of the new powers in helping law enforcement better address the unlawful assemblies. In particular, I recall them speaking to the usefulness of powers that served to deter and prevent individuals from joining and supporting the unlawful assemblies.
Records before the Governor in Council		
158.	You are aware the Clerk of the Privy Council has issued a certificate under s.39 of the Canada Evidence Act regarding the record before the Governor in Council?	Yes I am aware the Clerk issued a certificate, however, I have not seen it.
159.	You can agree the certificate under s.39 of the Canada Evidence Act regarding the record before the Governor in Council lists the records it is issued in relation to?	I have not seen it so I am not aware.
160.	<i>Undertaking 6 of 9</i> Can you undertake to produce the Submission to the Governor in Council, February 2022, in English and in French, from the Honourable Marco Mendicino, Minister of Public Safety and Emergency Preparedness, regarding the proposed Order in Council directing that a proclamation be issued pursuant to subsection 17(1) of the Emergencies Act?	Please see the objection from counsel in Annex 1.
161.	<i>Undertaking 7 of 9</i> Can you undertake to produce the Submission to the Governor in Council, February 2022, in English and in French, from the Honourable Marco Mendicino, Minister of Public Safety and Emergency Preparedness, regarding the proposed Order in Council pursuant to subsection 19(1) of the <i>Emergencies Act</i> and concerning emergency measures regulations?	Please see the objection from counsel in Annex 1.

No.	QUESTION	RESPONSE
162.	<i>Undertaking of 8 of 9</i> Can you undertake to produce the Submission to the Governor in Council, February 2022, in English and in French, from the Honourable Marco Mendicino, Minister of Public Safety and Emergency Preparedness, regarding the proposed Order in Council pursuant to subsection 19(1) of the <i>Emergencies Act</i> and concerning an emergency economic measures order?	Please see the objection from counsel in Annex 1.
163.	You have no knowledge of any other records being before the Governor in Council in this matter other than those listed in the certificate issued by the Clerk of the Privy Council under s.39 of the Canada Evidence Act?	No I have no knowledge of any other records.
164.	<i>Undertaking 9 of 9</i> If there are records that were before the Governor in Council in this matter other than those listed in the certificate issued by the Clerk of the Privy Council under s.39 of the <i>Canada Evidence Act</i>, can you undertaking to produce them?	Subject to the objection set out in Annex 1, my answer is: No, I have no knowledge of any other records.

ANNEX 1

**OBJECTIONS TO WRITTEN EXAMINATION QUESTIONS
OF STEVEN SHRAGGE**

No.	QUESTION	OBJECTION
1.	You did not give evidence or submissions to the Governor in Council when the hearing before the Governor General in Council was taking place on February 14, 2022 regarding whether to issue a Proclamation Declaring that a Public Order Emergency exists throughout Canada, P.C. 2022-0106?	The AGC objects to the question as well as the ones following (questions 2-6) in so far as it (they) incorrectly characterizes the decision-making process of the GIC in this matter as a “Hearing”. The GIC decision-making process is a private and confidential one. The GIC does not hold hearings.
8.	You are not the author of the document at Exhibit “A” of your affidavit.	Exhibit “A” is an explanation of the reasons for issuing the declaration. Pursuant to s. 58(1) of the <i>Emergencies Act</i> , it was prepared by the Government of Canada and tabled in Parliament by the Minister who made the submission to the GIC. Its authorship is irrelevant.
9.	The Governor-in-Council is not the author of the document at Exhibit “A” of your affidavit.	Exhibit “A” is an explanation of the reasons for issuing the declaration. Pursuant to s. 58(1) of the <i>Emergencies Act</i> , it was prepared by the Government of Canada and tabled in Parliament by the Minister who made the submission to the GIC. Its authorship is irrelevant.
10.	There is no author listed for the document at Exhibit “A” of your affidavit?	Exhibit “A” is an explanation of the reasons for issuing the declaration. Pursuant to s. 58(1) of the <i>Emergencies Act</i> , it was prepared by the Government of Canada and tabled in Parliament by the

No.	QUESTION	OBJECTION
		Minister who made the submission to the GIC. Its authorship is irrelevant.
11.	The Governor-in-Council is not the author of the document at Exhibit “B” of your affidavit.	Exhibit “B” is a copy of the Report to the Houses of Parliament: <i>Emergencies Act</i> Consultations that describes consultations with the Provinces. Pursuant to s. 58(1) of the <i>Emergencies Act</i> , it was prepared by the Government of Canada and tabled in Parliament by the Minister who made the submission to the GIC. Its authorship is irrelevant
12.	Except for the letter authored by the Prime Minister annexed thereto, there is no author listed for the document at Exhibit “B” of your affidavit?	Exhibit “B” is a copy of the Report to the Houses of Parliament: <i>Emergencies Act</i> Consultations that describes consultations with the Provinces. Pursuant to s. 58(1) of the <i>Emergencies Act</i> , it was prepared by the Government of Canada and tabled in Parliament by the Minister who made the submission to the GIC. Its authorship is irrelevant
13.	To your knowledge, did any of the Premiers of the Provinces in the consultation referred to in the letter of the Prime Minister annexed to Exhibit “B” support the invocation of the <i>Emergencies Act</i> , and if so, which ones?	This is not relevant nor does the <i>Jost</i> Notice of Application challenge the adequacy of the consultation. Additionally, see the answer provided by Mr. Shragge under this objection.
Integrated Terrorism Assessment Centre		
46.	<i>Mark a Full Exhibit 1</i> The Respondents agree that the Government of Canada’s “Federal Terrorism Response Plan: Domestic Concept of Operation” that is attached hereto and marked as Exhibit	No undertakings are required and none will be given. The affiant is limited to providing

No.	QUESTION	OBJECTION
	“1” can be a full exhibit in the herein proceedings without the necessity of it being exhibited to a further affidavit?	relevant documents within his power, possession and control. As Mr. Shragge noted, he does not work with the FTRP on a regular basis and the version provided for the purpose of this requested exhibit is not one that appears to be current.
51.	The Threat Highlight Jan 27 indicated that protestors in a convoy of Canadian truck drivers and supports were expected to arrive in Ottawa, Ontario around January 28th and 29th of 2022?	This is not a proper question. The document, which has been provided, speaks for itself.
52.	The Threat Highlight Jan 27 indicated that Parliament returns from Christmas adjournment on January 31, 2022 and this return could motivate a dedicated group of protestors to prolong their protest in Ottawa and seek interaction with Canadian politicians?	This is not a proper question. The document, which has been provided, speaks for itself.
54.	On February 8, 2022 ITAC released a document titled “Threat Highlight” and numbered as TH 22/11-E // 2022-02-08) hereafter “ Threat Highlight Feb 8 ”)?	This is not a proper question. The document, which has been provided, speaks for itself.
53.	The Threat Highlight Jan 27 indicated that a coordinated, complex terrorist attack or planned storming of Parliament or other federal locations was unlikely?	This is not a proper question. The document, which has been provided, speaks for itself.
56.	The Threat Highlight Feb 8 indicated that ITAC’s National Terrorism Threat Level assessment was Medium?	This is not a proper question. The document, which has been provided, speaks for itself.
57.	The Threat Highlight Feb 8 indicated that ITAC assessed the likelihood of a coordinated, complex terrorist attack or a planned storming of Parliament, legislatures, or government offices as unlikely?	This is not a proper question. The document, which has been provided, speaks for itself.
58.	The Threat Highlight Feb 8 indicated that ITAC’s opinion was that protestors in Ottawa seeking to undertake legitimate protest were distinct from actors espousing violence?	This is not a proper question. The document, which has been provided, speaks for itself.
59.	The Threat Highlight Feb 8 indicated that the threat of real violence would come from the possibility of “potential lone actor attackers”, not the legitimate protestors?	This is not a proper question. The document, which has been provided, speaks for itself.
75.	<i>Undertaking 1 of 9</i>	No undertakings are required and none will be given. The

No.	QUESTION	OBJECTION
	Can you undertake to provide true copies of all “Threat Highlight” documents released or dated by ITAC between January 26, 2022 and February 15, 2022?	affiant is limited to providing relevant docs within his power, possession and control. Mr. Shragge has access to other ITAC reports that would speak to “Threat Highlights” as referenced in this question during this period of time but the AGC objects to their production because they contain classified or other protected material that will garner the protections of ss. 37 or 38 of the <i>Canada Evidence Act</i>.
76.	<i>Undertaking 2 of 9</i> Further, and in particular, can you undertake to provide true copies of both Threat Highlight Jan 27 and Threat Highlight Feb 8?	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control. That said, the two Threat Highlights mentioned have been provided as Exhibits “B” and “C”, as they are under the power, possession and control of Mr. Shragge and they are not otherwise subject to a privilege or immunity.
77.	<i>Undertaking 3 of 9</i> Can you undertake to provide true copies of all official results and records regarding ITAC’s National Terrorism Threat Level assessments completed, dated or released between January 27, 2022 and February 15, 2022?	No undertakings are required and none will be given. The affiant is limited to providing relevant docs within his power, possession and control. Mr. Shragge does not have power, possession or control over all of the sorts of records that may be generated by ITAC nor would necessarily have knowledge of all of these.

No.	QUESTION	OBJECTION
		Mr. Shragge does have access to some other ITAC reports during this period of time but the AGC objects to their production because they contain classified or other protected material that will garner the protections of ss. 37 or 38 of the <i>Canada Evidence Act</i> .
78.	Can you agree the excerpts of documents attached hereto and marked as Exhibit “2” are excerpts from Threat Highlight Jan 27 and Threat Highlight Feb 8?	The full reports in question have been produced. They speak for themselves.
79.	<i>Mark a Full Exhibit 2 of 3</i> The Respondents agree that the excerpts from Threat Highlight Jan 27 and Threat Highlight Feb 8 that are attached hereto and marked as Exhibit “2” can be a full exhibit in the herein proceedings without the necessity of it being exhibited to a further affidavit?	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control. The source of the excerpts are unknown and the full version of each unclassified report has been provided. Therefore, there is no reason or value in exhibiting a particular copy of an excerpt.
111.	You can agree that by clicking on this link: https://publications.gc.ca/collections/collection_2020/scrs-csis/PS71-2019-eng.pdf a full true copy of the CSIS Public Report 2019 is available for your viewing?	This is not a question and does not require the affiant to agree or disagree. The affiant has reviewed the proposed document and answered the questions that followed.
Ideologically motivated violent extremism		
117.	There are a total of eight (8) IMVE Groups designated “terrorist entities” under the Criminal Code of Canada, and they include and are limited to the following: a. Combat 18, b. Blood and Honour, c. Proud Boys, d. Atomwaffen Division,	The regulations speak for themselves.

No.	QUESTION	OBJECTION
	e. The Base, f. The Russian Imperial Movement, g. Three Percenters: and h. Aryan Strikeforce?	
118.	You can agree that to be designated a terrorist entity under the Criminal Code of Canada requires some form of evidence that demonstrates an entity has knowingly carried out, attempted to carry out, participated in or facilitated a terrorist activity, or has knowingly acted on behalf of, at the direction of, or in association with such an entity?	Not relevant. Seeks legal opinion.
119.	You agree that the recommendation to list an entity in the <i>Criminal Code</i> terrorist listings regime is based on a security or criminal intelligence report prepared by either CSIS or Public Safety Canada, or a criminal intelligence report prepared by the RCMP?	Not relevant. Seeks legal opinion.
120.	You agree the last addition of an entity to the terrorist entity listings regime under the Criminal Code of Canada was in 2021?	Not relevant. The legislation speaks for itself.
121.	You agree there is no specific mention in your affidavit or any of its exhibits of Combat 18, Blood and Honour, Proud Boys, Atomwaffen Division, The Base, The Russian Imperial Movement, Three Percenters, or Aryan Strikeforce?	The affidavit speaks for itself.
126.	You agree there is no specific mention in your affidavit or any of its exhibits of any individual being physically injured on or between January 27, 2022 and February 14, 2022 in Ottawa?	The affidavit and exhibits speak for themselves.
127.	You agree there is no specific mention in your affidavit or any of its exhibits of any individual being physically injured between January 27, 2022 and February 14, 2022 at protests and purported “blockades” outside of Ottawa?	The affidavit and exhibits speak for themselves.
Parliamentary Security		
128.	On October 22, 2014 a lone attacker, Michael Zehaf-Bibeau, carried out an attack on Parliament Hill with a firearm?	Not relevant.

No.	QUESTION	OBJECTION
129.	In the October 22, 2014 attack, Michael Zehaf-Bibeau shot and killed Corporal Nathan Corillo of the Canadian Armed Forces?	Not relevant.
130.	Shortly after shooting Corporal Nathan Corillo, Michael Zehaf-Bibeau entered the Centre Block parliament building where Members of Parliament were, and engaged in a shootout with parliamentary security personal.	Not relevant.
131.	Following the October 22, 2014 attack on Parliament, security at Parliament was enhanced?	Not relevant.
132.	The enhancements in security at Parliament were focused on potential lone actor attackers, like Michael Zehaf-Bibeau?	Not relevant.
133.	Michael Zehaf-Bibeau's attack on Parliament on October 22, 2014 had no link to any form of protest taking place outside or in the vicinity of Parliament?	Not relevant.
134.	Can you agree many of the enhancements in security at Parliament arising from the October 22, 2014 attack were outlined in the June 3, 2015 document of the Hours of Commons titled "October 22, 2014 House of Commons Incident Response Summary" attached hereto and marked as Exhibit "3" ? <i>Mark a Full Exhibit 3 of 3</i>	Not relevant.
135.	The Respondents agree that the October 22, 2014 House of Commons Incident Response Summary attached hereto and marked as Exhibit "3" can be a full exhibit in the herein proceedings without the necessity of it being exhibited to a further affidavit?	Not relevant.
Incident Response Group		
142.	What are the names and titles of all the members of the Incident Response Group referred to in your affidavit?	There is no fixed membership for the Incident Response Group. An attendance list for each of the February 10, 12, and 13, 2022 IRG meetings is maintained by the Cabinet Papers System Unit and they come within the meaning of confidences of the Queen's Privy Council for Canada or

No.	QUESTION	OBJECTION
		Cabinet confidences as defined in s. 39(2) of the <i>Canada Evidence Act</i> . The AGC objects to their production on that basis.
145.	<i>Undertaking 4 of 9</i> Can you undertake to produce a true copy of the mandate of the Incident Response Group referred to in your affidavit?	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control. But see answer from Mr. Shragge in response to the content of the question.
146.	<i>Undertaking 5 of 9</i> Can you undertake to produce true copies of all minutes, notes, and records before and created by the members and attendees of the Incident Response Group meetings on February 10, 12 and 13, 2022 referred to in your affidavit?	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control. Cabinet confidentiality. Any minutes, notes and records for the IRG meetings come within the meaning of confidences of the Queen's Privy Council for Canada or Cabinet confidences as defined in s. 39(2) of the <i>Canada Evidence Act</i>.
Records before the Governor in Council		
160.	<i>Undertaking 6 of 9</i> Can you undertake to produce the Submission to the Governor in Council, February 2022, in English and in French, from the Honourable Marco Mendicino, Minister of Public Safety and Emergency Preparedness, regarding the proposed Order in Council directing that a proclamation be issued pursuant to subsection 17(1) of the Emergencies Act?	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control. Any such material is beyond the power, possession and control of Mr. Shragge This material is otherwise covered by the Certificate

No.	QUESTION	OBJECTION
		issued by the Clerk pursuant to s. 39 of the CEA. The question constitutes an improper collateral attack on the Clerk's Certificate.
161.	<i>Undertaking 7 of 9</i> Can you undertake to produce the Submission to the Governor in Council, February 2022, in English and in French, from the Honourable Marco Mendicino, Minister of Public Safety and Emergency Preparedness, regarding the proposed Order in Council pursuant to subsection 19(1) of the <i>Emergencies Act</i> and concerning emergency measures regulations?	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control. Any such material is beyond the power, possession and control of Mr. Shragge. This material is otherwise covered by the Certificate issued by the Clerk pursuant to s. 39 of the CEA. The question constitutes an improper collateral attack on the Clerk's Certificate.
162.	<i>Undertaking of 8 of 9</i> Can you undertake to produce the Submission to the Governor in Council, February 2022, in English and in French, from the Honourable Marco Mendicino, Minister of Public Safety and Emergency Preparedness, regarding the proposed Order in Council pursuant to subsection 19(1) of the <i>Emergencies Act</i> and concerning an emergency economic measures order?	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control. Any such material is beyond the power, possession and control of Mr. Shragge. This material is otherwise covered by the Certificate issued by the Clerk pursuant to s. 39 of the CEA. The question constitutes an improper collateral attack on the Clerk's Certificate.
164.	<i>Undertaking 9 of 9</i> If there are records that were before the Governor in Council in this matter other than those listed in the certificate issued by the Clerk of the Privy Council under	No undertakings are required and none will be given. The affiant is limited to providing relevant documents within his power, possession and control.

No.	QUESTION	OBJECTION
	s.39 of the <i>Canada Evidence Act</i> , can you undertaking to produce them?	PC 2022-106, PC 2022-0107, and PC 2022-0108 were before the Governor in Council (GIC) and are not listed in the certificate and have been produced by the Assistant Clerk. In any event, the remaining material that was before the GIC in this matter is beyond the power, possession and control of Mr. Shragge. This information is covered by the Certificate issued by the Clerk. The question constitutes an improper collateral attack on the Clerk's Certificate.

This is **Exhibit "B"** referred to
in the affidavit of
Steven Shragge
Affirmed before me this **15th** day
of **June, 2022**.



A Commissioner for taking affidavits

LSO 63497W

THREAT HIGHLIGHT

ITAC

CIET

Integrated Terrorism Assessment Centre

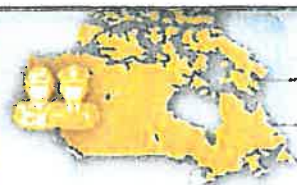
Centre intégré d'évaluation du terrorisme

TH 22/08-A // 2022-01-27

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CANADA: Extremists may attempt to seize the opportunity of public protest (U//FOUO)

TERRORISM THREAT LEVELS



CANADA → MEDIUM

→ MEDIUM

Uniformed Personnel

U//FOUO

LEGEND: Established → Raised → Lowered → Remains ↔

A convoy of Canadian truck drivers and their supporters are travelling from various cities to Ottawa to protest a federal vaccine mandate for truck drivers crossing the Canadian-United States (US) border. They are expected to arrive in Ottawa around 28 and 29 January. (U//FOUO)

While the organisers have declared that this is an act of peaceful protest, some ideologically motivated violent extremism (IMVE) followers in Canada have seized upon this rally to advocate for their own ideological objectives. Extremists and other individuals supporting COVID-19 conspiracy theories and violent anti-authority/anti-government views have expressed intent to participate in the convoy and to attend the accompanying protests in Ottawa: (U//FOUO)

- During a news interview with a convoy supporter in Saskatoon on 26 January, the supporter advocated civil-war and also noted he and others have guns. (U//FOUO)
- Online supporters of the convoy are calling for the convoy and associated protest to be used as Canada's 'January 6' opportunity, in reference to the insurrection of Capitol Hill in the United States in 2021. (U//FOUO)
- An online supporter of the convoy and protest espoused online "If anything we should grab Trudeau by the neck and kick the s**t out of him for what he's done. (U//FOUO)

BACKGROUNDER ON PROTEST CONVOY

The Government of Canada recently announced a federal mandate for truckers crossing the border to be vaccinated by 15 January 2022. This led to the so-called Freedom Convoy 2022 protest being organised largely through social media. Various convoys started across Canada on 22 January with the goal of arriving in Ottawa over the weekend of 28 and 29 January. In recent days, organisers of the protest have sought to distance themselves from the more extreme views of a vocal minority. (U//FOUO)

KEY JUDGMENTS

- Those seeking to undertake legitimate protest and dissent are distinct from actors espousing violent extremism. ITAC judges it possible that Canadian IMVE actors will insinuate themselves within the protest actions in Ottawa over the period of 28 and 29 January. It is possible that opportunistic, low-level violence will occur in Ottawa over the weekend, based on the likely presence of IMVE adherents and law enforcement. (U//FOUO)
- A small number of IMVE adherents could leverage an emotional crowd to spur on violence and destruction of government property through mob mentality dynamics, with the most likely target of violence being law enforcement or government officials near prominent federal buildings. (U//FOUO)

ASSESSMENT NOTE: This assessment is based on recent open source reporting. The intelligence cut-off date is 1300 on 27 January 2022. ITAC has MEDIUM confidence in its assessments due to the dynamic situation of the convoys. (U)

DEFINITIONS and HANDLING INSTRUCTIONS are located at the last page.

Canada

- It is possible that protestors, including IMVE adherents, could use rudimentary capabilities, such as trucks, cargo and fuel, to cause disruption to infrastructure and destruction of property. Uniformed personnel are the most likely target of opportunistic or low-level violence. (U//FOUO)
- The convergence of people in Ottawa represents an opportunity for other individuals or small groups inspired by Religiously Motivated Violent Extremism (RMVE) to capitalize on a potentially chaotic environment to conduct an unsophisticated attack. However, this is unlikely due to safety mitigation measures in place. (U//FOUO)
- We note that Parliament returns from Christmas adjournment on January 31 and this could motivate a dedicated group of protestors to prolong their protest in Ottawa and/or seek interaction with Canadian politicians. (U//FOUO)
- A coordinated, complex terrorist attack or planned storming of Parliament or other federal locations is unlikely. (U//FOUO)
- Due to the level of involvement of law enforcement and mitigation measures in place, ITAC assesses that the National Terrorism Threat Level (NTTL) and the terrorism threat level for uniformed personnel remain unchanged at MEDIUM; a violent act of terrorism could occur. (U//FOUO)

**A CANADIAN EXTREMIST GROUP
PROMOTING THE TRUCKER CONVOY
PROTESTS TO THEIR SUPPORTERS (U//FOUO)**



Sources: 4Chan, 27 January 2022

Terrorism Threat Levels

Canada

↔ MEDIUM



↔ MEDIUM

Threat levels as of 1 December 2021. (U//FOUO)



An act of terrorism **COULD OCCUR**. (U//FOUO)



There is intent *and* capability from both domestic and international extremist actors to commit an act of terrorism in Canada. (U//FOUO)



An act of terrorism directly affecting **uniformed personnel** in Canada **COULD OCCUR**. (U//FOUO)

- Intelligence indicates that an individual or group **within Canada** or abroad has the intent *and* capability to commit an act of terrorism in Canada. There remain individuals both in Canada and abroad who advocate violence and aspire to carry out terrorist attacks domestically. ITAC notes that inspired individuals typically act alone or in relatively small groups, and that attack planning can progress quickly, and may go undetected. **ITAC assesses that an act of terrorism could occur in Canada.** (U//FOUO)
- Propaganda identifying **uniformed personnel** as potential targets continues to be published online. ITAC notes there are indications of intent to target uniformed personnel in Canada. Notwithstanding, ITAC assesses that, at present, uniformed personnel are more likely to be targeted incidentally while performing their duties. **ITAC assesses that a violent act of terrorism affecting uniformed personnel in Canada could occur.** (U//FOUO)





ITAC's Probability Yardstick tool contributes to the understanding of the threat by providing readers with a common understanding of ITAC's probability statements.

THREAT LEVEL

LEVELS	DESCRIPTIONS	LANGUAGE
CRITICAL		ITAC assesses that a violent act of terrorism is HIGHLY LIKELY and COULD OCCUR IMMINENTLY .
HIGH	Intelligence indicates that an individual or group within Canada or abroad has the intent AND capability to commit an act of terrorism.	ITAC assesses that a violent act of terrorism is LIKELY .
MEDIUM		ITAC assesses that a violent act of terrorism COULD OCCUR .
LOW	Intelligence indicates that an individual or group within Canada or abroad has the intent OR capability to commit an act of terrorism.	ITAC assesses that a violent act of terrorism is POSSIBLE BUT UNLIKELY .
VERY LOW	There is no intelligence indicating a terrorist threat.	ITAC assesses that a violent act of terrorism is HIGHLY UNLIKELY .

ITAC's Threat Level chart defines each threat level and describes the assessed likelihood of a violent act of terrorism. ITAC uses both quantitative and qualitative analysis in applying terrorism threat levels. Threat levels are determined based on several factors, including current intelligence, recent events, and the assessed intent, capabilities and opportunity available to terrorist groups. ITAC cautions that its information may be incomplete and, regardless of the threat level applied, a violent act of terrorism may occur with little or no warning. See Confidence Levels.

CONFIDENCE LEVEL

CRITERIA	INTELLIGENCE	SOURCES	ASSUMPTION	REASONING
HIGH	multiple reports; well-corroborated information; range of reporting types; historical understanding of the issue; good understanding of the risk of deceptive reporting	proven and accurate	few; minimal intelligence gaps	strong logical inferences developed through analytic techniques or repeatable methodology
MEDIUM	multiple reports; partially corroborated plausible information; some historical understanding of the issue; some risk of undetected deceptive reporting	proven and semi-proven sources that have been fairly accurate	several, not critical to the analysis; some intelligence gaps	includes weak logical inferences developed through analytic techniques or repeatable methodology
LOW	few or single-source reports; uncorroborated information; some historical understanding of the issue; considerable risk of undetected deceptive reporting	semi-proven sources that have been somewhat accurate, or new, unproven sources	many; some critical to the analysis	dominated by weak inferences developed through analytic techniques or repeatable methodologies

ITAC's Confidence Levels chart outlines statements that accompany each ITAC product to inform the reader of ITAC's degree of confidence in its assessments. These levels are based on an evaluation of the available intelligence, the sources, and ITAC's assumptions and reasoning.

TERRORIST GROUP CAPABILITIES

ADVANCED		Capable of sophisticated attacks, including against hard targets
MODERATE		Capable of high profile attacks against soft targets
GENERAL		Capable of simple attacks

ITAC's Terrorist Group Capabilities chart describes the capabilities of a terrorist group to conduct an attack in a particular country where the group has already demonstrated intent. This metric is based on the methodology used to establish ITAC's terrorism threat levels. For the purposes of this metric, capability is defined as "the ability, capacity, competence or qualification" of a group to perpetrate a particular attack.

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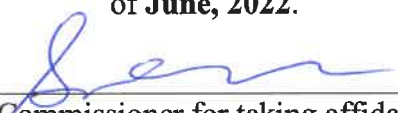
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Any feedback should be directed via email to ITAC at itac1@smtp.gc.ca

This document constitutes a record which may be subject to mandatory exemption under the Access to Information Act or the Privacy Act. The information or intelligence may also be protected by the provisions of the Canada Evidence Act. The information or intelligence must not be disclosed or used as evidence without prior consultation with ITAC.



This is **Exhibit "C"** referred to
in the affidavit of
Steven Shragge
Affirmed before me this **15th** day
of **June, 2022**.



A Commissioner for taking affidavits

LSO 634970

THREAT HIGHLIGHT

ITAC

CIET

Integrated Terrorism Assessment Centre

Centre intégré d'évaluation du terrorisme

TH 22/11-E // 2022-02-08

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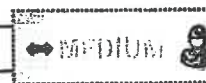
CANADA: IMVE threats in the midst of anti-vaccine protests in the NCR and across the country (U//FOUO)

U//FOUO

TERRORISM THREAT LEVELS



CANADA → MEDIUM



Uniformed Personnel

LEGEND: Established ↔ Raised ↑ Lowered ↓ Remains ↔

This assessment updates TH22/08 and focuses on the wave of protest in Canada on the weekend of 5 to 6 February in support of the ongoing "Freedom Convoy" to the National Capital Region (NCR). While the protests were initiated by truckers contesting vaccination mandates to cross the US border, events in Toronto, Winnipeg, Vancouver, Quebec City and Ottawa have been gathering various groups opposing public health measures. All events remained relatively peaceful, with limited low-level conflict. However, violent online rhetoric and the physical presence of ideological extremists at some gatherings remain a factor of concern. (U//FOUO)

SUMMARY OF EVENTS ACROSS CANADA

ONTARIO

- **Ottawa** saw approximately 7,000 people protesting and counter-protesting on Saturday, 5 February 2022. There were a number of minor incidents requiring police intervention, but the protests themselves were largely peaceful. Ottawa Police Services received approximately 200 calls about hate-related crimes, leading to 11 investigations. The City of Ottawa declared a state of emergency on Sunday, 6 February 2022. The protest attracted various anti-government figures, including conspiracy theorist Roman Didulo who in June 2021 encouraged her online followers to kill health professionals, burned a Canadian flag and symbolically raised another, declaring the new Kingdom of Canada in Ottawa. The burning of the flag reportedly angered other anti-government protestors. (U//FOUO)
- **Toronto** saw a protest and counter-protest on Saturday, resulting in two arrests—one related to a smoke bomb and the other to throwing feces. (U//FOUO)
- **Sarnia** police had to close part of Highway 402 that runs to the border crossing with Michigan because of pedestrians on the road near a convoy of trucks and tractors. (U//FOUO)

Protests inspired by the Canadian "Freedom Convoy" have also taken place in other countries without reported violence but with anti-authority messaging



Source: The Guardian (U//FOUO)

ASSESSMENT NOTE: This assessment is based on recent open-source, law enforcement liaison reporting. The information cut-off date is 10:00 hours on 7 February 2022. ITAC has MEDIUM confidence in its assessments due to the dynamic situation. (U)

ALBERTA

- **Couffts** continues to be the site of disruptive activities at the Canada–United States (US) border in protest of the vaccination mandate for truckers. The size of the protest has ebbed and flowed over the last ten days, and there is no information to suggest that organizers intend to end the protest. (U//FOUO)
- **Edmonton, Lethbridge and Calgary** saw peaceful protests throughout the weekend. (U//FOUO)

QUEBEC

- **Quebec City** saw several large convoys converge outside of the Quebec Provincial Assembly. The QAnon flag was observed, and the extremist group La Meute stated that approximately 100 members participated in the protest, and claimed that the same number attended the Ottawa protest. Police reported only one arrest associated with the Quebec City protest. The protesters left by the end of the day on 5 February, but indicated that they would return in two weeks. (U//FOUO)
- **Gatineau** police indicated that the extremist anti-vaccination group Farfadaas, which has been protesting near Chaudière Bridge to Ottawa since the beginning of the "Freedom Convoy," remained in place, although the group has indicated that it is running out of supplies. (U//FOUO)

BRITISH COLUMBIA

- **Vancouver** estimated that there were thousands of protesters in various locations around the city, with some counter-protests. Although the protests were generally peaceful, there were five arrests, including the arrest of an American from Washington State who was arrested with eggs and a knife. (U//FOUO)
- **Victoria** saw a protest of approximately 2,500 people, some of whom were counter-protesters. This was the second weekend in a row for protests in front of the British Columbia legislature. (U//FOUO)

MANITOBA

- **Winnipeg** protesters experienced minor injuries when an impaired driver drove into a group on the evening of Friday, 4 February 2022. The driver was released from custody on conditions and facing a number of charges. Initial information suggests that this incident is not of national security interest. (U//FOUO)

NOVA SCOTIA

- **Halifax** saw a convoy of hundreds of trucks and cars. (U//FOUO)

ASSESSMENTS

- Those seeking to undertake legitimate protest are distinct from those actors espousing violent extremism. The convergence of legitimate protest with ideological extremism both online and in cities across the country presents a possible trigger point and opportunity for potential lone actor attackers to conduct a terrorism attack. (U//FOUO)
- ITAC continues to assess that a coordinated, complex terrorist attack or a planned storming of Parliament, legislatures or government offices is unlikely at this time. The most likely ideologically motivated violent extremism (IMVE)-related scenario involves an individual or small group using readily available weapons and resources such as knives, firearms, homemade explosives and vehicles in public areas against soft targets, including opposition groups or members of the general public. (U//FOUO)
- ITAC judges that the "Freedom Convoy" protests have become a rallying point for anti-government and anti-authority, anti-vaccination, conspiracy theory, and xenophobic groups throughout North America and other Western countries. Convergences and instability of this kind will likely occur throughout 2022. (U//FOUO)
- We note that the "Freedom Convoy" is a direct and very public manifestation of the increasingly mainstream legitimization of violence against elected officials and public figures connected to COVID-19 related public health measures. (U//FOUO)

Terrorism Threat Levels

Canada	← MEDIUM		MEDIUM →	Threat levels as of 1 December 2021. (U//FOUO)
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-  An act of terrorism **COULD OCCUR**. (U//FOUO)
-  There is intent *and* capability from both domestic and international extremist actors to commit an act of terrorism in Canada. (U//FOUO)
-  An act of terrorism directly affecting *uniformed personnel* in Canada **COULD OCCUR**. (U//FOUO)
- Intelligence indicates that an individual or group **within Canada** or abroad has the intent *and* capability to commit an act of terrorism in Canada. There remain individuals both in Canada and abroad who advocate violence and aspire to carry out terrorist attacks domestically. ITAC notes that inspired individuals typically act alone or in relatively small groups, and that attack planning can progress quickly, and may go undetected. **ITAC assesses that an act of terrorism could occur in Canada.** (U//FOUO)
- Propaganda identifying **uniformed personnel** as potential targets continues to be published online. ITAC notes that there are indications of intent to target uniformed personnel in Canada. Notwithstanding, ITAC assesses that, at present, uniformed personnel are more likely to be targeted incidentally while performing their duties. **ITAC assesses that a violent act of terrorism affecting *uniformed personnel* in Canada could occur.** (U//FOUO)



ITAC's Probability Yardstick tool contributes to the understanding of the threat by providing readers with a common understanding of ITAC's probability statements.

THREAT LEVEL

LEVEL	DESCRIPTIONS	LANGUAGE
CRITICAL		ITAC assesses that a violent act of terrorism is HIGHLY LIKELY and COULD OCCUR IMMINENTLY .
HIGH	Intelligence indicates that an individual or group within Canada or abroad has the intent AND capability to commit an act of terrorism.	ITAC assesses that a violent act of terrorism is LIKELY .
MEDIUM		ITAC assesses that a violent act of terrorism COULD OCCUR .
LOW	Intelligence indicates that an individual or group within Canada or abroad has either the intent OR capability to commit an act of terrorism.	ITAC assesses that a violent act of terrorism is POSSIBLE BUT UNLIKELY .
VERY LOW	There is no intelligence indicating a terrorist threat.	ITAC assesses that a violent act of terrorism is HIGHLY UNLIKELY .

ITAC's Threat Level chart defines each threat level and describes the assessed likelihood of a violent act of terrorism. ITAC uses both quantitative and qualitative analysis in applying terrorism threat levels. Threat levels are determined based on several factors, including current intelligence, recent events, and the assessed intent, capabilities and opportunity available to terrorist groups. ITAC cautions that its information may be incomplete and, regardless of the threat level applied, a violent act of terrorism may occur with little or no warning. See Confidence Levels.

CONFIDENCE LEVEL

CRITERIA	INTELLIGENCE	SOURCES	ASSUMPTION	REASONING
HIGH	multiple reports; well-corroborated information; range of reporting types; historical understanding of the issue; good understanding of the risk of deceptive reporting	proven and accurate	few; minimal intelligence gaps	strong logical inferences developed through analytic techniques or repeatable methodology
MEDIUM	multiple reports; partially corroborated plausible information; some historical understanding of the issue; some risk of undetected deceptive reporting	proven and semi-proven sources that have been fairly accurate	several, not critical to the analysis; some intelligence gaps	includes weak logical inferences developed through analytic techniques or repeatable methodology
LOW	few or single-source reports; uncorroborated information; some historical understanding of the issue; considerable risk of undetected deceptive reporting	semi-proven sources that have been somewhat accurate, or new, unproven sources	many; some critical to the analysis	dominated by weak inferences developed through analytic techniques or repeatable methodologies

ITAC's Confidence Levels chart outlines statements that accompany each ITAC product to inform the reader of ITAC's degree of confidence in its assessments. These levels are based on an evaluation of the available intelligence, the sources, and ITAC's assumptions and reasoning.

TERRORIST GROUP CAPABILITIES

ADVANCED		Capable of sophisticated attacks, including against hard targets
MODERATE		Capable of high profile attacks against soft targets
GENERAL		Capable of simple attacks

ITAC's Terrorist Group Capabilities chart describes the capabilities of a terrorist group to conduct an attack in a particular country where the group has already demonstrated intent. This metric is based on the methodology used to establish ITAC's terrorism threat levels. For the purposes of this metric, capability is defined as "the ability, capacity, competence or qualification" of a group to perpetrate a particular attack.

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